## D. Mara Lowenstein, Esq.

October 4, 2018

Hon. Edgardo Ramos Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Segundo Luis Romero, individually and on behalf of others similarly situated v.

Dominick Doria & Son Wholesale Produce Inc. (d/b/a/ Dom Doria & Son Produce), et al.

Civil Action No: 18-CV-08508

Dear Judge Ramos,

Please consider this letter to be the first request for extension of time to file a response in the above captioned action for Defendants. A response is due to be filed on October 18<sup>th</sup>, 2018. However, my firm was just engaged for this matter. I spoke with Plaintiff's counsel earlier this week and filed a Notice of Appearance this morning. I write to respectfully request an extension of time to respond to the Complaint to November 15, 2018.

Defendants agree to waive any jurisdictional defense they may have based upon service of process. Plaintiffs' counsel has consented to this request.

Thank you for your consideration in this matter.

Very Truly Yours,

D. Mara Lowenstein, Esq. (DL 0623)